

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D. C. 20554

ORIGINAL

In the Matter of

Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
Culver, Indiana)

MM Docket No. _____

RM- _____

RECEIVED

NOV 22 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Petition for Rule Making

Larko Communications, Inc., by its attorney and pursuant to Commission Rules 1.401 and 1.420, submits this Petition For Rule Making proposing amendment of Rule 73.202(b) to allocate FM broadcast Channel 252A (98.3 MHz) to Culver, Indiana, as its first local radio service. In support of this request, the following is respectfully shown.

1. Culver is a Town formally organized under Indiana law with a population of approximately 1,400 people. It has a five-member Town Council and its own Zoning Board. It also has its own water and sewer department and police department. Its two public schools are operated by Culver Community Schools, a consolidated school district which also serves several nearby rural areas.

2. The Town's principal employers are the Culver Academies and the tourism industry. Culver is located on Lake Maxinkuckee, Indiana's second largest natural lake. During the summer, the Town's population more than doubles to approximately 3,200 persons. Many local businesses cater to these tourists and summer residents. The Culver Academies are located immediately outside the Town

No. of Copies rec'd 014
List ABCDE

MMB

limits. They were founded more than one hundred years ago and now have an enrollment of approximately 1,000 students in their regular and summer programs in grades 9 through 12. Many local residents are employed in academic and other positions with the Academies.

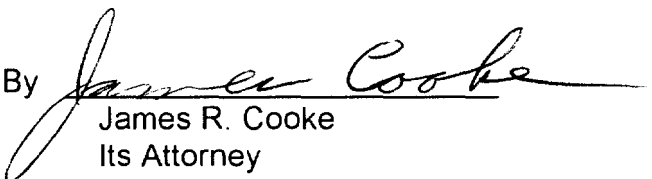
3. As shown in the attached Technical Report, Channel 252A can be allocated to Culver without a site restriction. Moreover, as shown by the permissible site area map in the Technical Report, there is ample area to locate a transmitter for a station with full Class A facilities.

4. If the channel is allocated as proposed, Larko will forthwith: (i) apply for authority to construct a station operating on that channel with full facilities; and (ii) if its application is granted, construct the authorized facilities.

Based upon the foregoing, petitioner requests that Commission Rule 73.202 be modified to allocate Channel 252A to Culver, Indiana as its first local service.

Respectfully submitted,

Larko Communications, Inc.

By 
James R. Cooke
Its Attorney

Harris Beach & Wilcox
Suite 300
1776 K Street, N.W.
Washington, D.C. 20006
(202) 861-0001

November 22, 1999

Jeffrey A. Goode

Indianapolis, IN

TECHNICAL REPORT

This Technical Report has been prepared in support of a Petition for Rulemaking to add FM Channel 252A to Culver, IN, amending the Table of Allotments, Section 73.202(b) of the FCC Rules, as follows:

<u>Community</u>	<u>Present Channel</u>	<u>Proposed Channel</u>
Culver, IN	None	252A (98.3 MHz)

An allocation study has been made for Channel 252A, using the US Census reference coordinates for the community of Culver, IN. The spacing from this location to other operating stations, proposals and allotments, was calculated using the methods described in Section 73.208 of the Rules. The required minimum spacing and the actual spacings are shown on the attached Table. As can be seen, this location would be fully spaced for non-directional Class A operation, exceeding the minimum distance requirements to all other considered facilities. A map of the permissible site location area is included. As shown, there is wide latitude in locating a potential site, while providing required coverage of the community of Culver. Therefore, no site restrictions would be required for the proposed allotment.

Table 1

FM Spacing Study

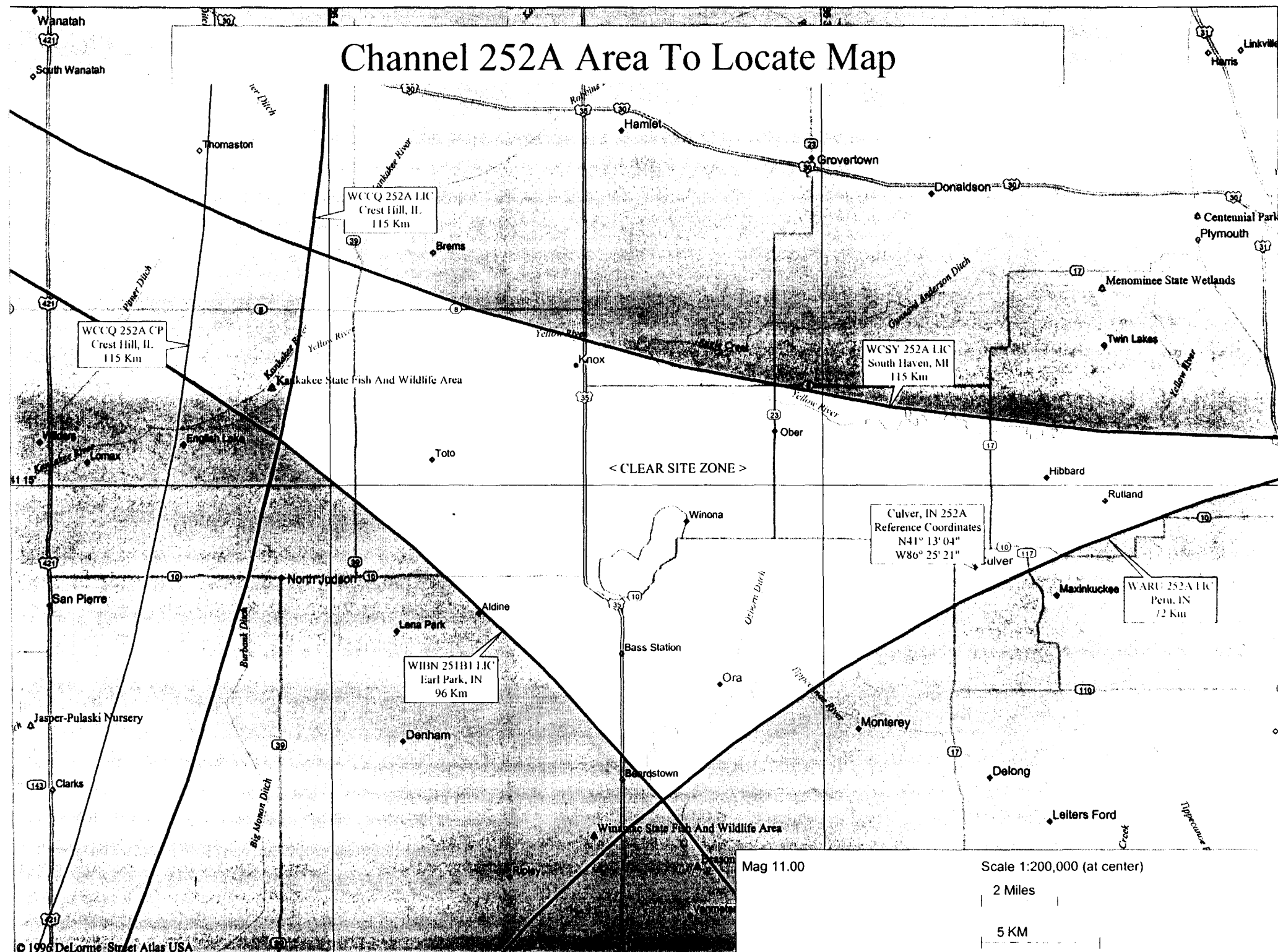
Channel 252A, Culver, IN

Reference Point: **41° 13' 04" N. Lat**
86° 25' 21" W. Long

(Distances in Kilometers)

<u>Facility</u>	<u>Location</u>	<u>Chan/ Class</u>	<u>Actual Distance</u>	<u>Required Distance</u>	<u>Clearance</u>
WDFM LIC	Defiance, OH	251B	158.2	113.0	45.2
WIBN LIC	Earl Park, IN	251B1	112.6	96.0	16.6
WARU LIC	Peru, IN	253A	72.8	72.0	0.8
WCSY LIC	South Haven, MI	252A	121.1	115.0	6.1
WCCQ LIC	Crest Hill, IL	252A	145.2	115.0	30.2
WCCQ CP	Crest Hill, IL	252A	149.5	115.0	34.5
WNWN LIC	Coldwater, MI	253B	151.0	113.0	38.0

Channel 252A Area To Locate Map



Mag 11.00

Scale 1:200,000 (at center)

2 Miles

5 KM

ENGINEERING STATEMENT

This Technical Report has been prepared by Jeffrey A. Goode,
8009 Christiana Way, Indianapolis, IN, 46256.

Mr. Goode states that he is a qualified Broadcast Engineer,
a holder of an FCC General Class Radiotelephone License, and is
familiar with the data and information required in this report.

Applications prepared by Mr. Goode have been accepted by the
Commission on previous occasions, and that this report and
exhibits were prepared by him, and;

That of the statements and information contained herein, he
believes them to be true and accurate to the best of his knowledge
and belief.

11-1-99

Date

A handwritten signature in black ink, appearing to read 'Jeff Goode', is written over a horizontal line.

Jeffrey A. Goode